

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

ORLANDO RODRIGUEZ, et.al.,  
Plaintiffs

Vs. Civil No. 98-1548 (GG)  
Consolidated with

Civil No. 97-2437 (GG)

CROWLEY TOWING AND TRANSPORTATION CO.  
SEAFARERS INTERNATIONAL UNION  
Defendants.

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**PLAINTIFFS' MOTION FOR STATUS CONFERENCE TO SET DISCOVERY  
SCHEDULE FOR DEPOSITIONS AND DOCUMENTARY PRODUCTION AND  
MOTION TO ALLOW JASON REMER, ESQ. TO BE ADMITTED AS CO-  
COUNSEL FOR PLAINTIFFS.**

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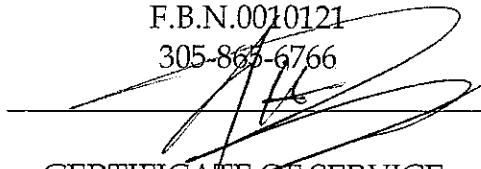
COME NOW THE PLAINTIFFS, through Counsel, and state:

1. Several matters are currently pending before this Court such as Plaintiffs' motion for reconsideration of Court's denial to allow several Plaintiffs to join this lawsuit, Defendant's Motions for summary judgment, Plaintiff's motion for Court to enter a Rule 54(B) judgment so that an appeal can be taken on the claims that were not allowed to join this case, and several discovery requests propounded by the Plaintiffs that have been objected to by the Defendants. Additionally, The Plaintiffs have sought to depose several of Defendants' witnesses to no avail.
2. Jason Remer, Esq. requests to appear pro hac vice before this Court as Co-Counsel for the Plaintiffs.
3. A one hour status conference is requested so that all outstanding discovery matters, etc... can be brought to the Court's attention and so that a discovery schedule can be established to conform with all Counsels' schedules for depositions of Defendants' witnesses.
4. If allowable, the undersigned would request to participate at the status conference by phone.

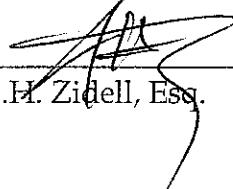
WHEREFORE, THE PLAINTIFFS REQUEST A STATUS CONFERENCE AND TO ALLOW JASON REMER, ESQ. TO APPEAR AS CO-COUNSEL PRO HAC VICE FOR THE PLAINTIFFS.

Respectfully submitted,

J.H. Zidell, Esq.  
300 71ST STREET #605  
MIAMI BEACH, FLA. 33141  
F.B.N.0010121  
305-866-6766

  
CERTIFICATE OF SERVICE:

I hereby certify that a true and correct copy of the foregoing was mailed by U.S. Mail OR FED EX to : Raquel M. Dulzaides at P.O. Box 366104, San Juan , Puerto Rico 00936-6104, Luis Suarez at Calle Felipe Goyco #503 San Juan, Puerto Rico 00915, and Ellen Silver, Esq., 5201 Auth Way, Camp Springs, Md. 20746 on this 13<sup>TH</sup> day of NOVEMBER , 2002.

By:   
J.H. Zidell, Esq.